



Miedel & Mysliwiec LLP

MEMO ENDORSED

October 26, 2020

Hon. Katherine Polk Failla
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Clifford Taylor, 19-CR-410

Dear Judge Failla:

A change of plea hearing is currently scheduled for Mr. Taylor on November 2, 2020. I write today to request an additional two-week adjournment of the hearing. The government consents to this request.

The change of plea conference was last scheduled for September 30th. I requested, and the Court granted, an adjournment of that conference by 30 days in order to allow me to obtain a full set of Mr. Taylor's medical records since his release by the Court in April, and to use the information in the medical records to try to persuade the government to offer a different plea.

For reasons that remain mystifying, it has taken exceedingly long to obtain the medical records. As Pretrial Services can attest, Mr. Taylor was required to go to the medical records room at St. Barnabas Hospital three times to try to get the records. Each time he was given the run-around, or told that he had to re-order them. I finally received confirmation from the hospital that the order had been processed around October 13th, but that the records would be printed and mailed from a facility in Georgia. After repeated efforts to confirm that the records had indeed been sent, we were finally told that they were mailed out on October 22nd. Miraculously, the approximately 400 pages of records arrived this afternoon.

In light of these delays, my planned discussions with the government have also been delayed, although with the arrival of the records, we are now scheduling a meeting for next week. Accordingly, with the government's consent, I respectfully request the change of plea conference to be adjourned for approximately two weeks. Notably, I am not available on November 17 or 18. If granted, Mr. Taylor consents to an exclusion of time from November 2, 2020 to the next date set by the Court under the Speedy Trial Act.

Thank you for your consideration.

Respectfully submitted,

/s/

Florian Miedel
Attorney for Clifford Taylor

cc: AUSA Daniel Wolf

Application GRANTED. The hearing scheduled for November 2, 2020, is hereby ADJOURNED to **November 20, 2020, at 10:00 a.m.**

It is further ORDERED that time is excluded under the Speedy Trial Act between October 27, 2020, and November 20, 2020. The Court finds that the ends of justice served by excluding such time outweigh the interests of the public and the defendant in a speedy trial because it will allow the defense to review Mr. Taylor's medical records and to continue plea discussions with the government.

Dated: October 27, 2020
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE